

EXHIBIT II

May 30, 2025

Brandon J. Hoerl

VIA MDL CENTRALITY

Williams Hart & Boundas, LLP
8441 Gulf Freeway, Suite 600
Houston, TX 77017
babramson@whlaw.com

2555 Grand Blvd.
Kansas City, Missouri 64108
t 816.474.6550
dd 816.559.2009
f 816.421.5547
bhoerl@shb.com

**Re: MDL 3084 - Notice of Plaintiff Fact Sheet Deficiencies
for WHB 1936, No. 3:24 -cv -04950, MDLC ID 1653**

Counsel,

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding [a] material deficiencies identified in the Plaintiff Fact Sheet (“PFS”) submitted on behalf of your client, WHB 1936, pursuant to Pretrial Order No. 10 issued by Judge Breyer on March 19, 2024 (“PTO 10”).

PTO 10 requires that all Plaintiff Fact Sheets submitted be “substantially complete.” PTO 10 provides that in order to be “substantially complete,” the PFS must include answers to “all applicable questions” and a “signed Declaration” verifying the PFS. Further, the PFS must be accompanied by all “duly executed record release Authorizations” and the production of the “requested documents.”

We received a PFS submitted on behalf of your client that is deficient in the following respects:

PFS Question #	Deficiency
II.2	Please provide middle name.
V.30.a	Please provide last known contact information for all individuals.

This letter constitutes notice of the deficiencies outlined above and Uber reserves the right to supplement this notice if any other deficiencies are identified for the plaintiff listed above. Pursuant to PTO 10, please provide Uber with [an amended PFS, a new verification, an amended Limited Authorization to Disclose Health Information (Ex. A), an amended Authorization to Disclose Psychiatric, Psychotherapy, and Mental Health Information (Ex. B), an amended Authorization to Disclose Law Enforcement Records (Ex. C), and any missing

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documents] on behalf of your client within 30 days. Although PTO 10 does not require the parties meet and confer about deficiencies in a PFS, Uber welcomes the opportunity to discuss the deficiencies outlined in this letter further if you believe it would be helpful. Please contact us via email about any such meet and confer. Regardless, the identified deficiencies must be remedied within 30 days of the date of this letter.

Uber reserves all rights with respect to all deficiencies in your client's PFS, including the right to move for dismissal with prejudice as to any plaintiffs who do not promptly provide sufficient disclosures in compliance with PTO 10.

Sincerely,

Brandon Hoerl

Brandon J. Hoerl
Staff Attorney
bhoerl@shb.com